

FILED

MAY 22 2020

UNITED STATES DISTRICT COURT

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY AB DEP CLK

for the
Eastern District of North Carolina

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

USPS Express Mail parcel EJ 335717449 US mailed
from Bunn, NC

Case No. 5:20-mj-1535-RN

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

USPS Express Mail parcel EJ 335717449 US mailed from Bunn, NC with a return address of Shane Sanne, 531
Sagamore Dr, Louisburg, NC 27549 addressed to Wesley O, 17595 Harvard Ste, C, #3950, Irvine, CA 92614

located in the Eastern District of North Carolina, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances and/or the proceeds from the sale of controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

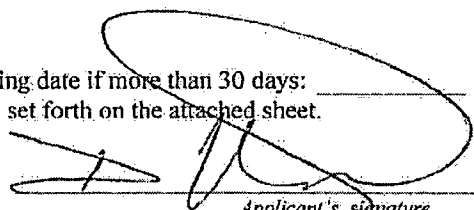
- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 21, United States Code, Sections 841 and 843.	Distribution and possession with intent to distribute controlled substances; Use of a communications facility

The application is based on these facts:
See attached Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



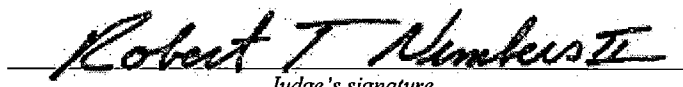
Applicant's signature
Dustin C. Holland/Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 over the telephone.

Date: May 22, 2020

City and state: Raleigh, NC



Judge's signature
Robert T. Numbers II, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Dustin C. Holland, being duly sworn, state as follows:

1. My name is Dustin Holland, and I am a United States Postal Inspector. I have been working as a Postal Inspector for over sixteen years and am currently assigned to the Raleigh, North Carolina, office of the United States Postal Inspection Service ("USPIS"). Prior to joining the USPIS, I was a Deputy Sheriff and Narcotics Investigator with the Nash County Sheriff's Office for nearly five years. As a Postal Inspector, I enforce federal laws relating to postal offenses. My assignment includes, but is not limited to, investigations of mail fraud, mail theft, credit card fraud, identity theft, burglaries and robberies of Post Offices, non-mailable items, including hazardous materials, narcotics and threatening communications. I have written over one thousand (1000) search warrants on parcels suspected of containing controlled substances or proceeds from the sale of controlled substances. I have also written and/or assisted in the service of over one hundred fifteen (115) search warrants for illegal controlled substances. Based on my training and experience, I am personally familiar with the color, shape, texture and odor of most illegal controlled substances, including but not limited to, crack cocaine, cocaine, heroin, methamphetamines, ecstasy and marijuana. This affidavit is submitted in support of an application for a Search Warrant for USPS Express Mail parcel EJ 335717449 US mailed from Bunn, NC with a return address of Shane Sanne, 531 Sagamore Dr, Louisburg, NC 27549 addressed to Wesley O, 17595 Harvard Ste, C, #3950, Irvine, CA 92614 (SUBJECT MAIL PARCEL).

2. On May 20, 2020, SUBJECT MAIL PARCEL was identified as having similar characteristics to previously mailed parcels known to contain illegal narcotics or the proceeds from the sale of controlled substances. The parcel was subsequently pulled from the mailstream for additional examination.

3. The return address printed on the label was Shane Sanne, 531 Sagamore Dr, Louisburg, NC 27549. Investigation determined there is no Shane Sanne associated with the Sagamore Dr address. I know from my training and experience that people who ship and receive controlled substances via the U.S. Mail often use fictitious names, phone numbers and/or addresses in attempts to disassociate themselves from the controlled substances.

4. On May 21, 2020 at approximately 1:31 p.m., a line of parcels was set up at the USPIS office in Raleigh, NC. The parcels were set up in an area which is not used to store or maintain any controlled substances. The line of parcels consisted of the suspect parcel and five additional parcels of various shapes and sizes. The five additional parcels were prepared by this affiant and did not contain any controlled substances. Postal Inspectors requested assistance from Wake County Sheriff's Office (WCSO), Master Deputy Maria G. Fuentes and "Santos," a certified narcotics detection dog. Master Deputy M. Fuentes and "Santos" searched the parcel lineup for the odor of controlled substances. Master Deputy M. Fuentes advised agents that "Santos" had 'alerted' on SUBJECT MAIL PARCEL. Master Deputy M. Fuentes stated that, in the past, "Santos's" alerts have led to the apprehension of narcotics traffickers and seizures of controlled substances. Master Deputy M. Fuentes advised agents that she is very familiar with "Santos's" actions, having worked with him for over 20 months, and is certain "Santos" was alerting on the USPS Parcel. Master Deputy M. Fuentes



advised agents that "Santos" 'alerts' to the odor of crack cocaine, cocaine, heroin, methamphetamines and marijuana. Master Deputy M. Fuentes stated, based upon her experience, she believed "Santos" was indicating by the alert, the parcel contained the odor of controlled substances.

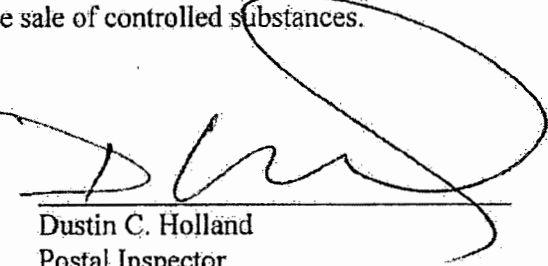
5. Prior investigations by U.S. Postal Inspectors have determined the U.S. Mails are being used to transmit controlled substances from California to other destinations in the United States. I further know materials relating to the distribution of controlled substances are often included in these packages along with the controlled substances. I have seized numerous parcels being mailed to California with proceeds from the sale of illegal narcotics which were forfeited. I have also seized countless parcels mailed from California containing controlled substances. Individuals who regularly handle controlled substances often leave the scent of controlled substances on the box and other packaging material that they handle. Packaging materials are also often stored in close proximity to the controlled substances, transferring the odor of the controlled substance to the packaging material, for which narcotic canines are trained to alert on these scents.

6. Based upon the information provided by WCSO Master Deputy M. Fuentes and "Santos," a certified narcotics detection dog's 'alerting' on the parcel, the fact that California is a proven source originating point for the shipment of controlled substances through the mail and that these facts are consistent with past narcotics trafficking investigations via the United States Mails from California to North Carolina, it is my belief that SUBJECT MAIL PARCEL contains a controlled dangerous substance or the proceeds from the sale of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

INTENTIONALLY LEFT BLANK.

7. The parcel is presently in the custody of the Postal Inspection Service Office in Raleigh, NC. Affiant seeks authority for agents to open the parcel for search and seizure of controlled substances or proceeds from the sale of controlled substances.

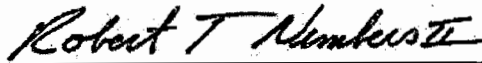
Further your affiant sayeth not.



Dustin C. Holland
Postal Inspector
United States Postal Inspection Service

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this written affidavit.

Dated: May 22, 2020



Robert T. Numbers, II

United States Magistrate Judge

